

# EXHIBIT J

# LATHAM & WATKINS<sup>LLP</sup>

May 6, 2020

## VIA EMAIL

Kenneth J. Black  
414 Union Street, Suite 900  
Nashville, TN 37219  
Phone: (615) 244-2203  
kennyb@rgrdlaw.com

355 South Grand Avenue, Suite 100  
Los Angeles, California 90071-1560  
Tel: +1.213.485.1234 Fax: +1.213.891.8763  
www.lw.com

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Re: *Grae v. Corrections Corp. of America, et al.*, No. 3:16-cv-02267

Counsel:

Pursuant to the Court's April 30, 2020 Order (Dkt. No. 211) (the "April 30 Order"), enclosed as Exhibit A is an updated privilege log that "include[s] the counsel and legal staff involved for each document withheld as privileged." *See* April 30 Order at 10, 23.

Additionally, the Court found that CORECIVIC\_0959395 was not privileged. *Id.* at 20, 23. Defendants, therefore, have updated their redaction log to remove that document.<sup>1</sup> Defendants' updated redaction log is enclosed as Exhibit B. Because Plaintiffs have CORECIVIC\_0959395 in their possession (*see* Plaintiffs' Motion to Compel, Ex. 4, Dkt. No. 196-4), Defendants are not producing another copy of that document. For purposes of identifying the document, the parties may use the document's original bates number (CORECIVIC\_0959395), and can disregard the updated bates number, which was intended to identify the redacted version of the document (CORECIVIC\_1795412).

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<sup>1</sup> CORECIVIC\_1795142 – the redacted version of CORECIVIC\_0959395 – was removed from Defendants' redaction log.

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With production of these updated logs, Defendants have fully complied with the Court's April 30 Order.

Best regards,

A handwritten signature in black ink, appearing to read "Eric C. Pettis". The signature is stylized with a large, sweeping "E" and a distinct "P".

Eric C. Pettis  
of LATHAM & WATKINS LLP

Encl.

CC: David Schindler  
Brian Glennon  
Sarah Tomkowiak  
Steve Riley  
Trey McGee  
Morgan Whitworth  
Dennis Herman  
Willow Radcliffe  
Christopher Wood  
Jason Forge  
Christopher Lyons